

1 Rhonda H. Wills
2 Appearance Pro Hac Vice
3 WILLS LAW FIRM, PLLC
4 1776 Yorktown, Suite 570
5 Houston, Texas 77056
6 Telephone: (713) 528-4455
7 Facsimile: (713) 528-2047
rwillslawfirm.com

George P. Moschopoulos
The Law Office of
George Moschopoulos, APC
34197 Pacific Coast Highway,
Suite 100
Dana Point, California 92629
Telephone: (714) 904-1669
Facsimile: (949) 272-0428
georgem@logmapc.com

8 ATTORNEYS FOR PLAINTIFFS
9 AND THE PUTATIVE CLASSES

10
11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA

13 RON HENRY, ET AL., on behalf of
14 themselves and all others similarly
situated,

15 Plaintiffs,

16 v.

17 JPMORGAN CHASE & CO. and
18 JPMORGAN CHASE BANK, N.A.,

19 Defendants.

20 Case No. 15-CV-03895-PSG-PLA

21 Hon. Philip S. Gutierrez

22
**DECLARATION OF RHONDA
H. WILLS IN SUPPORT OF
PLAINTIFF JOSE OMAR
MARTINEZ'S EX PARTE
APPLICATION FOR AN ORDER
STRIKING DEFENDANTS'
OPPOSITION TO PLAINTIFF'S
MOTION FOR CONDITIONAL
CERTIFICATION**

DECLARATION OF RHONDA H. WILLS

Pursuant to 28 U.S.C. § 1746, I state under penalty of perjury that the following is true and correct:

1. My name is Rhonda H. Wills. I am over the age of eighteen years, capable of making this declaration, and fully competent to testify to the matters stated here due to my position, experience, and personal knowledge. I have personal knowledge of the facts stated, and they are true.

2. I am counsel for Plaintiff Jose Omar Martinez in the above-referenced matter. I make this declaration in support of Plaintiff's *Ex Parte* Application for an Order Striking Defendants' Opposition to Plaintiff's Motion for Conditional Certification (Dkt. 98).

3. At 3:33 PM on Friday, September 16, 2016, my office contacted Defendants' counsel, notifying counsel for Defendants that we intended to file an *ex parte* application and identifying the substance of the proposed application. Defendants' counsel has indicated that Defendants are opposed to the filing of our *ex parte* application.

4. I checked the font size of Defendants' Opposition to Plaintiff's Motion for Conditional Certification. I printed Defendants' Opposition brief, making sure to set the "Page Scaling" option in Adobe Acrobat Pro to "none." I then measured

1 the length of the text on page one, line 24 of Defendants' brief. The text measures
2 15.7 cm long.

3 5. I copied and pasted Defendants' brief into Microsoft Word and printed
4 out the same text found on page one, line 24 of Defendants' brief with non-
5 condensed 14-point Times New Roman font. The text measures 16.4 cm long.
6

7 6. I then adjusted the same text in Microsoft Word, condensing the type
8 face by 0.2 points, still using 14-point Times New Roman font. When the same text
9 was condensed by 0.2 points, it again measured 15.7 cm long.
10

11 I declare under penalty of perjury under the laws of the United States of
12 America that the foregoing is true and correct.
13

14 Executed on September 19, 2016
15

16 By: /s Rhonda H. Wills
17 Rhonda H. Wills
18
19
20
21
22
23
24
25
26
27
28